

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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UNITED STATES OF AMERICA

v.

AGUSTIN FRANCISCO HUNEEUS,

Defendant.

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) Case No. 19-cr-10117-IT-7  
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**ASSENTED-TO MOTION FOR RETURN OF PASSPORTS**

Agustin Francisco Huneeus, through undersigned counsel, hereby moves for the return of his United States and Chilean passports upon his release from prison, which passports are in the custody of the United States Probation/Pretrial Services Office.

In support of this motion, Mr. Huneeus states as follows.

1. On March 29, 2019, Mr. Huneeus made his initial appearance in this Court, and on May 21, 2019, Mr. Huneeus pleaded guilty to a one count Information alleging a violation of 18 U.S.C. § 1349.

2. As part of his release conditions, the Court ordered that Mr. Huneeus surrender any passports to the United States Probation/Pretrial Services Office. Mr. Huneeus complied with that order on March 29, 2019.

3. On October 4, 2019, the Court sentenced Mr. Huneeus to 5 months of imprisonment, 2 years of supervised release, 500 hours of community service, a \$100,000 fine, and a \$100 special assessment. Mr. Huneeus has satisfied his fine and special assessment obligations.

4. On November 4, 2019, Mr. Huneeus reported to the facility to which he was

designated by the Bureau of Prisons (“BOP”) to serve his term of imprisonment.

5. The United States Probation/Pretrial Services Office remains in possession of Mr. Huneus’ passports.

Accordingly, Mr. Huneus respectfully requests that the Court direct the United States Probation/Pretrial Services Office to return his United States and Chilean passports to him or undersigned counsel upon his release from BOP custody.

Respectfully submitted,

/s/ Jeremy M. Sternberg

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*Counsel for Agustin Francisco Huneus*

Dated: November 7, 2019

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that counsel for Mr. Huneus conferred with Assistant United States Attorney Justin O'Connell who assents to this motion.

/s/ Jeremy M. Sternberg  
Jeremy M. Sternberg

**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2019 this document was filed through the ECF system and will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants, and to USPO Martha Victoria via email.

/s/ John A. Canale  
John A. Canale